

State Water Resources Control Board

March 5, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6195 8770

Ms. Cherri Francis
Management Assistant
GSA Fleet Services Department
Ventura County
11201 A-1 Riverbank Drive
Ventura, California 93003
cherri.francis@ventura.org

**SUBJECT: NOTICE OF VIOLATION - UNDERGROUND STORAGE TANK SYSTEMS AT
GOVERNMENT DETENTION FACILITY SITE #2, 800 SOUTH VICTORIA
AVENUE, VENTURA**

Dear Ms.: Francis

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on February 22, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Monitor Tank – The site uses an automatic tank gauge (ATG) to perform monthly 0.2 gph leak rate test on the single-walled tanks. The Veeder Root monitoring panel was not programmed to the correct leak detection specification requirement of “enhanced mode” at time of inspection.	All	February 22, 2018	Ongoing	H&SC 25292(a); 23 CCR 2643(b)(1)
2	Failure to Monitor Tank – Test results for the 0.2 gph leak rate test for the month of June 2017 was missing.	All	June 1, 2017	June 30, 2017	H&SC 25292(a); 23 CCR 2643(b)(1)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Monitor Product Piping – The liquid sensor in the under dispenser containment 1-2 was incorrectly positioned at an angle preventing a leak from being detected at the earliest opportunity.	All	February 22, 2018	Ongoing	23 CCR 2641(a)
4	Failure to Monitor Product Piping – The secondary containment test boot in the turbine sumps was found on and the Schrader-Valve port was capped. Thus, preventing a leak from being detected at the earliest opportunity.	T1	February 22, 2018	Ongoing	23 CCR 2641(a)
5	Failure to Maintain Tank Information – There is one tank system information for only one UST in CERS, but there are two USTs onsite. Enter required tank information into CERS for the second UST.	All	February 22, 2018	Ongoing	23 CCR 2711(a)
6	Failure to Maintain Monitoring Plan – There is one tank system monitoring information for only one UST in CERS, but there are two USTs onsite. Enter required tank monitoring information into CERS for the second UST.	All	February 22, 2018	Ongoing	H&SC 25286(a); 23 CCR 2641(h), 2711(a)(9)
7	Failure to Tag Monitoring Equipment – The ATGs were missing the annual monitoring certification tags for the most recent monitoring system certification performed on March 13, 2017.	All	February 22, 2018	Ongoing	23 CCR 2641(j)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and City of Ventura Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Will Speth
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
will.speth@waterboards.ca.gov

Local CUPA

Mr. Alex Coronado
Hazardous Material Specialist
Fire Prevention Division
City of Ventura Fire Department
1425 Dowell Drive
Ventura, California 93003
acoronado@cityofventura.net

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amantha Henkel".

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: (via email only)

Mr. Foster McLean
Fire Prevention Supervisor
City of Ventura Fire Department
fmclean@cityofventura.net

Mr. Joe Grant
Hazardous Material Specialist
City of Ventura Fire Department
jgrant@cityofventura.net

Mr. Alex Coronado
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